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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

**UNITED STATES EQUAL
 EMPLOYMENT OPPORTUNITY
 COMMISSION,**

Plaintiff,

v.

**FREMONT AUTOMOBILE
 DEALERSHIP, LLC dba FREMONT
 TOYOTA,**

Defendant.

CASE NO. CV 11-04131 CRB

**STIPULATION AND ~~PROPOSED~~ ORDER
 FOR CONTINUANCE**

Plaintiff UNITED STATES EQUAL EMPLOYMENT OPPORTUNITY COMMISSION (hereinafter “Commission” or “EEOC”) and Defendant FREMONT AUTOMOBILE DEALERSHIP, LLC, dba FREMONT TOYOTA (hereinafter “Fremont Toyota”), through their respective counsel have conducted numerous meet and confers regarding early mediation of the above case. The parties have agreed to utilize the Court’s early ADR program and have filed a stipulation/order requesting that this case be referred to mediation with Jeffrey A. Ross, a respected private mediator with the Court’s ADR program, who has decades of experience litigating the type of employment discrimination issues similar to those in the present case.

The parties jointly request the following continuance to accommodate the schedules and availability of the selected mediator and individuals necessary to the ADR process in order to maximize the likelihood of a successful mediation. Accordingly, the parties respectfully submit the following stipulated request to:

- 1) Continue the deadline for Defendant to file its ANSWER, currently set for October 31, 2011, by an additional 14 days.
- 2) Continue all other pending deadlines, including but not limited to the ADR deadline and the initial Case Management Conference, currently set for December 9, 2011, by an additional 60 days.

Date: October 26, 2011

By: /s/ Raymond T. Cheung

Raymond T. Cheung
U.S. EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION
San Francisco District Office

Date: October 26, 2011

By: /s/ Kurt T. Hendershott

Kurt T. Hendershott
Chapman & Intrieri, LLP
Attorney for Defendant
Fremont Automobile Dealership, LLC

ORDER GRANTING CONTINUANCE

IT IS SO ORDERED. Case Management Conference reset for February 10, 2012 at 8:30 a.m.

Dated: October 27, 2011

